

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHICAGO JOE'S TEA ROOM, LLC	)	
an Illinois Limited Liability Company	)	
and PERVIS CONWAY	)	
	)	Case No. 07 CV 2680
Plaintiffs,	)	
	)	Honorable Judge John Z. Lee
vs.	)	
	)	
THE VILLAGE OF BROADVIEW, et al.	)	
	)	
Defendants.	)	

**PLAINTIFFS' MOTION TO STAY HENRY VICENIK'S MOTION TO STAY  
BRIEFING ON DEFENDANT VICENIK'S PETITION FOR FEES**

Plaintiffs Chicago Joe's Tea Room, LLC ("Chicago Joe's") and Pervis Conway ("Conway") (collectively "Plaintiffs") hereby move this Honorable Court for leave to stay briefing on Defendant Vicenik's petition for fees for a reasonable time to allow Chicago Joe's Tea Room, LLC and Pervis Conway to retain counsel to replace Nixon Peabody, Dean J. Polales and Timothy J. Horton, and in support thereof states as follows:

Defendant Vicenik has filed a Motion seeking fees. Plaintiffs' response to said motion was due June 11, 2019.

1. There will be no prejudice from granting such a motion since the next status will not occur until August 18, 2019, and the Court has the pending Village of Broadview's Motion to Dismiss under advisement.

2. Mr. Horton has left the firm of Nixon Peabody and Mr. Polales' last day at Nixon Peabody will be June 30, 2019. In light of Mr. Polales' motion to withdraw and departure from Nixon Peabody, the undersigned believes that new counsel should handle this matter.

3. Plaintiffs have interviewed potential new counsel but need additional time to finalize and engagement of same.

WHEREFORE, Plaintiffs respectfully requests that this Court grant Plaintiffs motion.

Dated: June 25, 2019.

Respectfully submitted,

CHICAGO JOE'S TEA ROOM LLC  
and PERVIS CONWAY

By: \_\_\_\_\_/s/ Dean J. Polales

Dean J. Polales  
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*One of the Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served on all counsel of record via electronic case filing procedures on June 25, 2019.

/s/Dean J. Polales